

## REMARKS

In the July 1, 2005 Office Action, the Examiner noted that claims 1-27 were pending in the application; rejected claims 1, 3-5, 7, 8, 10-12, 14, 15, 17-19, 21, 22 and 24-27 under 35 USC § 102(b); and rejected claims 2, 6, 9, 13, 16, 20 and 23 under 35 USC § 103(a). In rejecting the claims, U.S. Patents 6,108,625 to Sabourin (Reference A in the July 1, 2005 Office Action) and 5,913,194 to Karaali et al. (Reference B in the January 3, 2005 Office Action) were cited. Claims 1-27 remain in the case. The Examiner's rejections are traversed below.

### Examiner Interview

The undersigned wishes to thank the Examiner for the productive Examiner Interview held October 5, 2005. During the Examiner Interview, additional portions of Sabourin were discussed which were not cited in the July 1, 2005 Office Action. Included was a discussion of the compound word handler 405 and letter-to-phoneme handler 406 described in columns 7-9 and the detailed description of the phonemic transcription and syllabification processes described in columns 9-16 with reference to Figs. 5-12.

### Rejections under 35 U.S.C. § 102(b)

In item 4 on pages 2-3 of the Office Action, claims 1, 3-5, 7, 8, 10-12, 14, 15, 17-19, 21, 22 and 24-27 were rejected under 35 USC § 102(b) as anticipated by Sabourin. In this rejection, it was asserted that "recalculating grapheme-phoneme conversion of the graphemes bordering on the at least one interface between the subwords as a function of the context of the at least one interface" (e.g., claim 1, last two lines) was disclosed at column 6, line 28 to column 7, line 14. This portion of Sabourin describes affix handler 402 (Fig. 4) which "transcribes input orthographies by identifying a root word within the orthography, and then using an 'affix rule knowledge base' to extend the basic transcription of the root word to the complete transcription" (column 6, lines 28-31). Three sets of transcription rules are provided in the affix rule knowledge base. "The first set specifies how root orthographies may be modified to generate their affixal forms" (column 6, lines 33-36). "The second set of transcription rules ... specifies how root transcriptions are modified when the affixal form of the word is formed" (column 6, lines 43-46) and "the third set of transcription rules ... specifies how the part of speech of the root word changes when modified to its affixal form" (column 6, lines 38-51). "In operation, orthographies received by affix handler 402 are decomposed ... into a sequence consisting of ... prefixes, root word, and suffixes. The root word is then transcribed using a dictionary lookup scheme" (column 6, lines 54-58). The transcription of the root word is modified "according to the

transcription affix transformation rule base and the part-of-speech transformation rule base" (column 6, line 61-63).

Although "portions of certain affixes are contextually influenced, such as the suffix '+s' ... and the suffix '+ed'" (column 6, lines 65-67), the only detailed description of how context is used is associated with Tables V and VII in columns 8 and 9 with reference to Fig. 5 which describes the operation of letter-to-phoneme handler 406. As illustrated in Table V, the context is between one letter or pair of letters (Source Grapheme Sequence) and the preceding or following letter. This is to be expected since it is in a description of the letter-to-phoneme handler 406 which does not deal with "subwords" (e.g., claim 1, line 4), but rather individual letters.

The use of the word "contextually" (column 6, lines 65-66) in the description of the affix handler of Sabourin also appears to relate to individual letters, not subwords as in the present invention. The examples in the portion of Sabourin cited as disclosing the recalculating operation recited in claim 1 are the letter "s", the letters "ed" and the letters "ing". None of these constitute "subwords" as that term is used in the specification, rather they are, as described in Sabourin, suffixes. The distinction is immediately apparent from the example in paragraph [0022] of the application where the subwords are "überflüssig" and "erweise," neither of which is a suffix and part of the first includes the common prefix "über".

More importantly, Sabourin does not disclose "recalculating grapheme-phoneme conversion" (claim 1, next-to-last line). As illustrated in Fig. 4, if dictionary accessor 401 is unable to convert a word, one or more attempts are made to convert the word using a series of handlers, each of which is used to accomplish the **first** conversion of a word or numeral. The only one of these handlers which appears to operate using subwords is compound word handler 405. The operation of the compound word handler is described in the paragraph spanning columns 7 and 8, the following two paragraphs, and Table IV. The first full paragraph in column 8 mentions the need to "resolve stress inconsistencies introduced by the concatenation ... by modifying the stress field of the output transcription so that there is only a single primary stress" (column 8, lines 6-9). However, there is no suggestion in this statement that there is any change in the phoneme used in the transcription, the only change is in the emphasis associated with the phoneme.

For at least the above reasons, it is submitted that claim 1 and claims 3-5 and 7 which depend therefrom patentably distinguish over Sabourin.

Like claim 1, the last two or three lines of claims 8 and 15 contain the limitation "recalculating grapheme-phoneme conversion of the graphemes bordering on the at least one interface

between the subwords as a function of the context of the at least one interface" and claim 22 recites that the processing unit "recalculate(s) the grapheme-phoneme conversion of the graphemes bordering on the at least one interface between the subwords as a function of the context of the at least one interface" (claim 22, lines 10-12). Therefore, it is submitted that claims 8, 15 and 22 and claims 10-12, 14, 17-19, 21 and 24-27 which depend therefrom patentably distinguish over Sabourin for at least the reasons discussed above with respect to claim 1

**Rejections under 35 U.S.C. § 103(a)**

In item 6 on page 4 of the Office Action, claims 2, 6, 9, 13, 16, 20 and 23 were rejected under 35 USC § 103(a) as unpatentable over Sabourin in view of Karaali et al. Nothing was cited or has been found in Karaali et al. suggesting modification of Sabourin to recalculate grapheme-phoneme conversion as recited in the independent claims. Therefore, it is submitted that claims 2, 6, 9, 13, 16, 20 and 23 which depend from claims 1, 8, 15 and 22 patentably distinguish over the applied art for at least the reasons discussed above with respect to the independent claims.

**Summary**

For at least the reasons discussed above, it is submitted that claims 1-27 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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